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W.M.,

PLAINTIFF(S),

-vs-

J.O.,

DEFENDANT(S).

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CASE NO. 1:22-cv-03707-RBK-EAP

CIVIL ACTION

**NOTICE OF MOTION TO
ENFORCE RULE 45 SUBPOENA
AND TO SEAL MATERIALS**

TO: CARES Institute (f/k/a Center for Children's Support, Special Care Center)
Rowan University
42 E. Laurel Road, Suite 1000
Stratford, New Jersey 08084

PLEASE TAKE NOTICE that on the 1st day of May, 2023 at 9:00 a.m. or as soon thereafter as the matter may be heard, the undersigned counsel for Defendant J.O. shall move before the Honorable Elizabeth A. Pascal, United States Magistrate Judge, for an Order:

1. Enforcing the Subpoena Duces Tecum served upon CARES Institute on or about February 3, 2023, and
2. Directing CARES to produce to counsel for Defendant, full and complete response to the subpoena within 10 days; and

3. Sealing the materials submitted in support of the Motion.

PLEASE TAKE FURTHER NOTICE that Defendant relies upon the Affidavit of Counsel together with the Exhibits thereto and attached letter-brief in support of the requested relief submitted herewith. All referenced materials are being submitted under seal.

PLEASE TAKE FURTHER NOTICE that Defendant relies upon the additional Affidavit of Counsel in support of sealing, per Federal Local Civil Rule 5.3.

JAVERBAUM WURGAFT HICKS
KAHN WIKSTROM & SININS, P.C.

/s/ Rubin M. Sinins
By: Rubin M. Sinins, Esq.